

SITE-SPECIFIC CHARGING FOR THE GOLD KING MINE RELEASE

The following code must be used in PeoplePlus (PPL), CONCUR (travel), and on contract vehicles to account for time, travel, and resources spent on this response:

A8K9RV00 GOLD KING MINE RELEASE - REMOVAL ACTION - OU 00

This Site-Specific Identifier or Superfund Site ID (SSID) code was established by Region 8 at the start of the release. It is a different SSID from the pre-remedial SSID set up for other work at the site. **All regions, including 6 and 9, should use the same SSID.**

Time/Payroll Charging & Tracking

- OSWER/OCFO expects offices to charge this code to their home office for base salary, travel and contracts -- and not to Region 8. It is near the end of the fiscal year and all HQ/Regional resources will be monitored to ensure there are sufficient funds to address this response and to avoid obligating more than what we have available and violating the Anti-Deficiency Act. This is a coordinated EPA action, not just Region 8.
- **The organization code for site-charging should be the employee's home office.** The response for Gold King Mine is where the release of hazardous substances occurred and where they have become to be located which we realize crosses state and regional boundaries.
- The A8K9 SSID code should be added to the employee's account favorites in People Plus as this will save time and ensure appropriate tracking. **Please do not change an employee's normal fixed account number (FAN).**
- If you need assistance setting up this site charging code in PPL, your timekeeper should be able to provide assistance to you.
- Prior entries in People Plus should be adjusted, as appropriate, to account for time spent on this response that started on August 5, 2015.
- OEM will coordinate with those that work in the EOC to ensure they have this information and are tracking their time appropriately. OEM/EOC finance desk contact is Lavone Martinez (202-250-8913) if you have further questions.

Overtime

- Overtime – If an employee is performing activities beyond the scope of normal duties and/or normal work hours, these employees should charge overtime to the region or HQ office requesting the assistance ORG code (*i.e.*, Region 6 or Region 8 or OEM/EOC).
- This does require a change to the ORG CODE in the site account built in their PPL favorites.
- Reminder: Overtime hours must be approved in advance and documented using EPA Form 2560-7 (rev. 5/09), Request for Overtime Authorization, available in EPA Webforms <http://intranet.epa.gov/webforms/>. Employees must complete this form, have it approved by your supervisor and it must be retained in accordance with federal records schedules.

Travel, Expenses & Contracts

- **The SSID code should also be used for site-specific travel, expenses, and contract vehicles related to the response.**
- Those regions sending staff on travel in response to this event, should charge their own site-specific travel accounts and include the SSID.
- **Reminder: only a Contract Officer with warrant authority can commit funds for the Agency.** There should be no unauthorized commitments.

Questions & Answers

Why Should I Site-Specifically Charge My Time?

- A: Site-specific charging is an important part of tracking the Agency's efforts and will ensure that Agency costs are accounted for properly and assigned to the appropriate site. The PeoplePlus system is the EPA's tool for time and labor and records site-specific charging.

Reminder: only employees can attest and submit their time. Supervisors cannot do this.

What Basic Guidance Would You Suggest for Site-Specific Charging?

- A: Ask yourself the question, "would I be working on this task, if it were not for this Superfund Site incident?" when determining if it is appropriate to site-specifically charge your time. Track and charge all time related to a specific site, including meetings, time spent on correspondence (including e-mails) and other site-related activities.

Keep track of your time in quarter hour increments.

Do Managers Have to Site-Specifically Charge their Time?

- A: Yes. All employees, from the Regional Administrator down, should site-specifically charge their time when it is appropriate. Every employee's timesheet should reflect site-specific time if that employee worked on a site-specific matter, no matter where the employee resides (e.g., Superfund program office, legal counsel, community relations, finance, etc.). There are even times when non-Superfund employees should site-specifically charge their time. For instance, a toxicologist from the pesticide office might provide technical assistance regarding a Superfund cleanup and that time should be captured site-specifically.

What Are Some Examples of When to Site-Specifically Charge?

- A: Below are some examples of tasks related to a Superfund site that should be tracked and charged site-specifically.
- **OSC** - drafting an Action Memo; developing an administrative record; directing cleanup contractors; conference calls; meetings with counsel or technical consultants
 - **RPM** - drafting a ROD; overseeing PRP-lead cleanups; 5 year reviews; management briefings; meetings with counsel or technical consultants
 - **Technical Enforcement** - PRP search activities; developing General, Special Notice, Demand, and 104(e) letters; developing waste-in lists; ability-to-pay analysis
 - **Legal** - reviewing Action Memos and RODs; referrals to DOJ; AOC and CD negotiations; meetings with DOJ; meetings with OSCs, RPMs, enforcement specialists or scientists
 - **Community Relations** - developing factsheets; public meetings; telephone conversations with local officials and concerned community members; development of the repository
 - **Finance** - contracts related to a Superfund site; developing cost recovery packages; testimony on accounting procedures related to a Site; meetings with OSC/RPM/Legal to review SCORPIOS data
 - **Secretary** - processing site-specific travel authorization and vouchers; large mailings and copy requests related to a Superfund site
 - **Management** - meetings with counsel, program, enforcement, community relations, or finance;

reviewing staff documents related to a Site; management briefings; meetings with DOJ

What if a Region 6 person does work in Region 8, should they use a Region 6 or a Region 8 account number?

A: The employee should still be on their Regional payroll/FAN/organization code. The SSID code provides an additional identifier which tracks the time to the specific site. Travel should cite the home office organization code plus the SSID as all current federal travel regulations are applicable.

What if a Region needs to shift resources?

A: In cases where existing resources are re-directed from some other project to support the Gold King Mine response, program offices should amend the existing vehicle and funding documents to capture the SSID.